

## **Opportunities to Promote Localism via Low Power Radio**

Low power radio is, at bottom, the most locally oriented broadcast service the Commission licenses. The Commission has made great strides to adopt LPFM, promote it, and process applications to enable stations to get on the air.

The Commission has within its power the ability to take several steps that will promote LPFM. First, we suggest the Commission ask Congress to “vote for decency” by returning to the FCC its authority to place LPFM stations on third adjacent channels. Using the frequencies more efficiently and putting some of it in the hands of schools and churches is a pro-active means to promote appropriate content over our airwaves.

In addition, the following steps are within the FCC’s power to effectuate presently:

- Allow waivers or grant an extension for the length of a LPFM construction permit (CP). Given the length of time most applicants wait for a CP, many volunteer organizations need significant time to reinvigorate their volunteer base in order to put a station into operation. At present some LPFM CPs have already lapsed. Additional time would have allowed more of these CPs into stations.
- Recommend a thorough consideration of IBOC’s opportunities to incorporate or promote LPFM using the advantages of digital technology. For example, similar to the current operation of translators, perhaps LPFM stations could be carried via a second or supplemental or digital signal.. Digital terrestrial radio should not be implemented without careful consideration of whether additional voices, including LPFM, can be improved using the new technology. Simply allowing LPFM stations to convert to digital may not be enough.
- Reconsider the exception for noncommercial translators which allows them to obtain programming via satellite, rather than directly from transmitters. *See* 47 CFR § 74.1231. This exception allows noncommercial radio stations to broadcast programming that is not locally originated, and, in fact, could originate from anywhere and be delivered via satellite. Such a policy does not promote localism. We request the Commission make LPFM stations primary to translators that are not locally fed. In addition, the Commission should consider phasing out the exception altogether.
- Take what ever steps possible to remedy the devastating impact newly-authorized translators will have on third adjacent channel low power radio stations. As detailed in the attached issue brief, if all the translators applied for in last year’s window are authorized, only 4 LPFM stations remained available out of the 279 that the FCC predicted would be available in 1999.